



**University of  
Nottingham**  
UK | CHINA | MALAYSIA

# **Modern Slavery Act 2015: Annual statement 2024**

**Reporting period August 2023  
to July 2024**



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# Introduction

The University of Nottingham, UK (‘the University’) is committed to combatting modern slavery and human trafficking. This annual statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes the University’s modern slavery and human trafficking statement for the financial year ending 31 July 2024.

This statement summarises how the university’s structures, processes, recent actions and future plans directly address the government’s key modern slavery themes including:

- 1. our organisational structure
- 2. ongoing activities to monitor and engage with our supply chains on this topic
- 3. actions to review and refine relevant policies, due diligence and compliance processes in relation to slavery and human trafficking
- 4. the steps we’ve taken in the last year against previously noted modern slavery commitments (and their effectiveness and results)
- 5. updates on our staff training related to modern slavery and trafficking

The activities outlined in this report cover the period August 2023 – July 2024 (aligned with the university’s financial year).

**At the University of Nottingham we solve hard problems and improve lives.**

## Organisational structure

The university has gained an outstanding international reputation for its world-class teaching and research. The university employs around 8,000 staff, across five faculties containing schools and departments supported by teams of professional service staff. The five faculties are: Arts, Engineering, Medicine and Health Sciences, Science, and Social Sciences. The university is home to the Rights Lab: the largest group of modern slavery scholars in the world, and home to the world’s leading academic experts on modern slavery.

The university is a corporation formed by Royal Charter and holds charitable status. Two main bodies are involved in the governance of the university, the Council and the Senate. At the head of the university is the Vice-Chancellor and President. The day-to-day management of the university is the responsibility of University Executive Board (UEB).



## Our supply chains

The university purchases goods, services and works from a diverse range of suppliers, across a number of categories. It is recognised that the university’s supply chains are global and complex when considering multi-tier suppliers, therefore the university’s procurement functions have utilised the expertise of the Rights Lab to identify the highest risk areas within these categories of spend. This joint approach helps inform both the prioritisation and risk impact as the university continues to develop its due diligence processes.

The university recognises modern slavery risks are present throughout the contracting lifecycle and is therefore embedding due diligence into its contract and supplier management programme. The university also undertakes a significant amount of collaborative work with research partners and this area has been included as part of the university’s approach when adopting due diligence processes in relation to its obligations under the Modern Slavery Act (MSA) 2015. Further details of recent actions and future commitments are detailed below.

### Our modern slavery policy

The university is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its business.

The university’s existing [Modern Slavery and Human Trafficking Policy](#) was drafted in 2015 to reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

The Modern Slavery and Human Trafficking Policy complements the annual statement and aims to establish the university’s zero-tolerance approach to modern slavery and to promote compliance. The policy is listed within the Business Arrangements section of the [University’s Ethical Framework](#).



Employs around <b>8,000</b> staff (UK)	
Total income <b>£823m</b> (2022–23)	Operating expenses <b>£326m</b> (Spend outside of pay 2022-23)

## University of Nottingham’s Modern Slavery Act Working Group

### Four years on: our steps towards a Slavery-Free Campus

In 2020 the university began designing and testing an internationally pioneering, 38-step Blueprint to achieving a Slavery-Free Campus. Commissioned and led in its development by the University’s Modern Slavery Act Working Group, and based on ongoing research led by the university’s world-leading Rights Lab, the Blueprint provides a guide for all universities to take action towards becoming slavery free. This ambitious, transformational, social value initiative was the first of its kind globally and remains closely aligned with the principles of the Modern Slavery Act 2015. After a year of implementation testing, our approach was launched publicly in July 2021 by the university’s Chancellor, Baroness Lola Young.

The Blueprint continues to enjoy strong University Executive Board sponsorship and Council endorsement. It continues to form the basis of our work to tackle modern slavery risk in our operations and supply chains, and to shape the vision, progress and reporting of our Working Group, both in this Modern Slavery Statement and our wider communications.

The university is proud to be an active, global leader in helping deliver the vision of a slavery-free campus whilst also informing the approach taken by other public sector organisations and companies by leveraging our in-house expertise.

## Our commitments and actions (financial year 2023-24)

In its previous Modern Slavery Statement, the university laid out a series of commitments and goals as we continue our journey towards a slavery-free campus. This section of the report lists these previous goals / commitments and updates on progress (including evidence of impact or effectiveness wherever possible).

These commitments, and associated progress updates, are presented against the four sections used in last year’s report:

- Governance
- Managing risk in the supply chain
- Awareness and training
- Civic engagement

In addition, this year has also seen the Working Group focus more explicitly on student-related aspects of modern slavery and an additional section heading of ‘Students’ is therefore included, summarising the actions taken this year related to this business-specific topic. The Working Group has also consciously created a workstream focused on Research and Innovation & Fundraising to ensure that our systems, processes and activities under these headings align with our commitments on modern slavery. Initial activities are underway with further plans detailed in the future commitments section below.

Governance

We have continued to evolve our approach to governance around modern slavery work at the university to become a slavery-free campus based on our 38-step blueprint. We restructured our Working Group to better accelerate this effort, and continue to have overt sponsorship from our University Executive Board and our Chancellor for this work. This year we achieved the following:



Our commitments

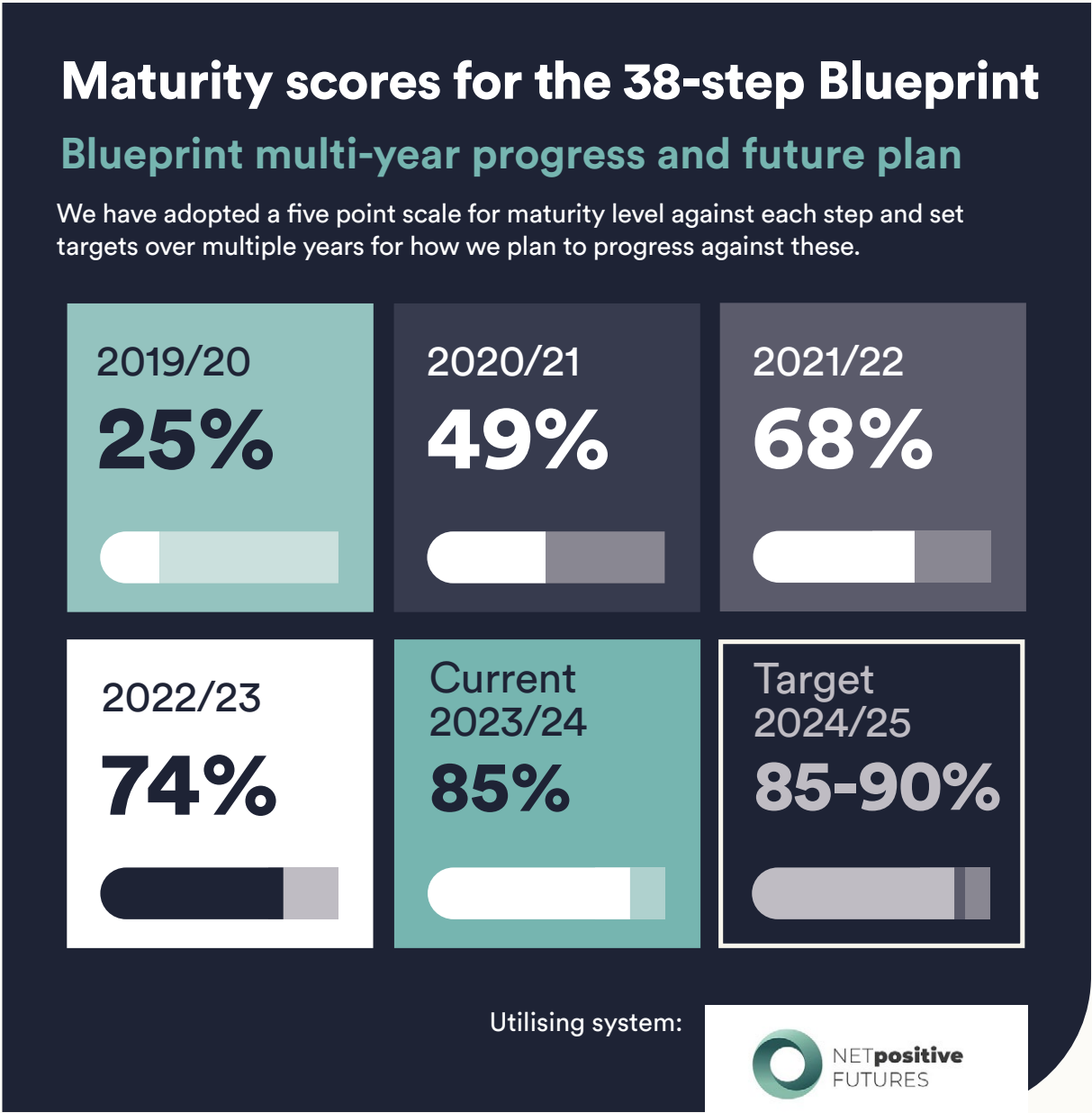
- ✓ 1. Further explore possibilities for adapting elements of the Blueprint for implementation at the university’s international campuses.
- ✓ 2. Continue to progress our maturity score on our Slavery-Free Campus Blueprint and aim to improve our score from this year’s 74% to a level of 80-85%.
- ✓ 3. Expand our engagement with internal and external stakeholders to support our anti-slavery goals with a specific focus on key subsidiaries (for example Nottingham Venues).
- ✓ 4. Further develop our Modern Slavery dashboard to support collaboration with our suppliers – indicating where modern slavery has been discussed during supplier meetings and overall level of risk and engagement.
- ✓ 5. Continue to develop our university policies and procedures to ensure that modern slavery is referenced where this is appropriate.
- ✓ 6. Investigate how to incorporate modern slavery requirements into the development of our new HR, Finance and Procurement system that will support our anti-slavery work.
- ✓ 7. Enhance the use of our student engagement dashboard to flag concerns around student attendance on courses that may suggest a risk of modern slavery, linking in with our Safeguarding (Report and Support) team.
- ✓ 8. Continue to develop internal processes (in partnership with key external organisations) to identify if there are patterns of concern in regard to the potential exploitation of international students in a modern slavery context.
- ✓ 9. Implement the recommendations made in the recent internal effectiveness review report to enhance the effectiveness of the university’s activities related to modern anti-slavery.

Our actions

- ✓ 1. The Working Group continues to engage with colleagues at the university’s international campuses, including on new UKRI-funded research launched in 2024 in collaboration with University of Nottingham Malaysia (UNM) colleagues about whether labour clauses in trade deals and investment arbitration mechanisms work to protect people and businesses against risks of modern slavery. In addition, the University of Nottingham’s Rights Lab is now delivering an estimate of the prevalence of cross-border trafficking in Malaysia, launched in 2024, to complete by 2025. This will include new data that can support UNM in its understanding of contextual risk factors.

- ✓ 2. **Blueprint Tracker:** The university continues to progress against the aspirations outlined in the original blueprint.

Figure 1: Blueprint maturity score as part of Modern Slavery dashboard



The university’s work to embed action against modern slavery into its policies and practices was reflected in its high ranking for UN Sustainable Development Goal (SDG) 8 (Decent Work, including ending modern slavery) in the *Times Higher Education Impact Rankings 2024*, which are the only global performance tables that assess universities against the SDGs. The ranking for SDG 8 was the university’s highest ranking: joint 53 out of 1,149 institutions and our submitted materials included information on our Slavery-Free Campus Blueprint and the work of our Rights Lab. We are proud to be recognised among the world’s top higher education institutions for our efforts.

- ✓ 3. The university has supported Nottingham Venues to make significant updates to its modern slavery policy, modern slavery risk assessment, modern slavery training and Modern Slavery Statement.



- ✓

4. The university continued to use the next generation of the Modern Slavery dashboard for procurement. This was introduced last year to include key measures: number of suppliers signed up to NetPositives, supplier rationalisation statistics for UK and International suppliers, the number of contracts awarded on UoN Terms and Conditions and the risk profile for the tenders undertaken in year. We have now begun indicating where modern slavery has been discussed in supplier meetings. Future reporting on supplier discussions will be reported under the Supply Chains section of this report.
- ✓

5. The Modern Slavery Policy is currently under review (June 2024) to ensure it is fit for purpose. If required, an updated policy will be drafted and made public once the review has completed (expected in FY24/25). In 2023, the Policy Management Framework was established, triggering a review of all university policies and their governance. The Modern Slavery Committee has begun dialogue with the central Assurance team to explore the interplay between the policy and the statement and to identify development requirements to bring the policy into alignment with the Framework. The aim is for this work to be concluded before August 2025.
- ✓

6. The Working Group remains ready to support the integration of modern slavery requirements into the university’s new HR, Finance and Procurement system which now will be launched in financial year 2024-25 rather than 2023-24.
- ✓

7. The university’s student engagement dashboard is continuing to flag concerns around student attendance, and our Safeguarding team is working to enhance this dashboard further. Future commitments involving student safeguarding will be reported under the new Student Workstream, led by our Safeguarding team.
- ✓

8. Our reporting on actions against the commitment to identify any issues about the potential exploitation of international students are now reported on in the new Students section of this report.
- ✓

9. An active Modern Slavery Act Working Group ensures that the university’s commitments on this topic are regularly updated, monitored and reported. We continued to apply our governance approach to deliver against our Slavery-Free Campus Blueprint, meeting throughout the year to review progress and agree priorities for the next period. The Committee includes senior representatives from key university functions including a senior representative from the Students’ Union, and is currently chaired by the Dean of the Nottingham University Business School.



In order to action the recommendations of last year’s internal effectiveness review report, the Working Group has implemented a new way of working by introducing a workstream structure, detailed in Appendix 1. Over the last year, the Working Group has refreshed its structure, membership and ways of working and is now supported by six workstreams as follows:

**Workstream 1 – Governance and policy**

Current workstream lead – Dean of Nottingham University Business School

**Workstream 2 – Training and awareness**

Current workstream lead – Associate Director of Learning and Development

**Workstream 3 – Research and innovation & fundraising**

Current workstream lead – Strategic Lead International, Research and Innovation

**Workstream 4 – Managing risk in the supply chain**

Current workstream lead – Head of Procurement

**Workstream 5 – Students**

Current workstream lead – Senior Manager for Safeguarding

**Workstream 6 – Civic engagement**

Current workstream lead – Director of the Rights Lab

Each workstream lead plus the Chair now form the Working Group membership. The Working Group meets at least quarterly or more frequently if required.

Further details about each Workstream, including their Mission Statements, may be found in Appendix 1.



# Managing risk in the supply chain

The University’s Procurement team continued to take a risk-based approach and further enhanced its knowledge and capability to identify and action risk within the supply chain. This year we achieved the following:



## Our commitments

- ✓ 1. We commit to run an annual assessment on our procurement spend to understand the distribution of risk in our supply chain and to inform where we should focus due diligence as part of our Modern Slavery Procurement risk tool. We will continue to review our modern slavery risk profile annually across our previous year’s spend and build this data into out category strategies and resulting approved suppliers.
- ✓ 2. We will continue to engage with our Tier 1 suppliers about modern slavery as they are onboarded onto our Supplier Relationship Management programme or as part of ongoing reviews. We will outline our work on a Slavery-Free Campus, introduce our Code of Conduct and explore activities our suppliers are undertaking in the detection and prevention of modern slavery in their supply chains that we may collaborate on.
- ✓ 3. Use the recent updates to NetPositives to inform how we monitor supplier engagement and leverage the improved questions asked of suppliers to better reflect how modern slavery is addressed.
- ✓ 4. Our Procurement team will continue the use of the Modern Slavery risk tool for every new procurement. Improvements to the tool will reflect the revised commodity codes being used alongside the new HR, Finance and Procurement system.
- ✓ 5. The Procurement team will continue to investigate how they can make best use of the Electronics Watch relationship during IT related hardware tenders.

## Our actions

- ✓ 1. During this year the Rights Lab’s Modern Slavery Risk Barometer was applied to both the university itself and a key subsidiary: Nottingham Venues (that manages and delivers a range of hotel infrastructure, facilities and hospitality teams across the university’s estate).

Figure 2: The Risk Barometer for the University of Nottingham



The Risk Barometer is a comprehensive risk assessment tool, combining 69 metrics – each selected and weighted as important proxies for modern slavery risk. The underlying model data includes comprehensive legislative data, Earth Observation data, and proprietary Rights Lab datasets. The assessment indicates risk levels across how an organisation operates, where it operates/ sources from and in which industry sectors.

The organisation demonstrates an ‘emerging low risk’ that modern slavery will take root and persist and/or an emerging level of resilience and capability to respond to these issues.

The risk assessment results and associated recommendations will be incorporated into the 2024/2025 improvement action planning. We plan to take actions in response to the detailed risk scores, and aim to see our scores improve over time.

- ✓ 2. The university has ensured that Tier 1 strategic suppliers are onboarded into our Supplier Relationship Management programme with an understanding of our work on a Slavery-Free Campus, introduced to our Code of Conduct, and we explore activities our suppliers are undertaking in the detection and prevention of modern slavery in their supply chains on which we may collaborate.

Figure 3: Understanding our suppliers – a summary of the 11,111 sources of supply\* by category risk for 2022-23

Level 1 category codes		
High risk	40% of our suppliers	4,396 in total
Level 1 category codes		
Medium risk	6% of our suppliers	612 in total
Level 1 category codes		
Low risk	55% of our suppliers	6,103 in total

\*Sources of supply is not the same as the unique number of suppliers used by the university.

- ✓ 3. In addition, we ensure the remaining parts of the supply chain agree to the Code of Conduct and sign up to NetPositives so that resulting actions plans can be analysed and monitored.
- ✓ 4. Our Procurement team has committed to assess the modern slavery risk of every new procurement using our in-house tool and to track the risk profile of our activity via monthly KPIs alongside sustainability, EDI and social value, as part of our commitment to conduct responsible procurement.

The university continues to supplement existing KPIs on modern slavery, sustainability, EDI and social value with richer data from our suppliers on risks and actions. This allows the identification of focus areas where the university could provide further support to the supply base through education.

- ✓ 5. The Procurement team has engaged with Electronic Watch to assess the specific risk throughout their supply chain for laptops and desktops. This information is being used to help mitigate future risk when re-tendering this contract and address any actions that are recommended as part of the reports.



# Awareness and training

We have continued to develop our awareness and training programme through increased engagement across the university community, including by creating a new Learning Resource for all staff due for launch in 2024. This year we achieved the following:



## Our commitments

- ✓ 1. Continue to identify scope for supporting degree programmes to enhance student education and training on modern slavery, with a particular focus on professional degree programmes. In the coming year we plan to embed education and training via the Curriculum Transformation Programme.
- ✓ 2. Continue to work with colleagues across the university to develop our staff and student training offer (including the launch of new online content) with the aspiration of this being required for all new staff and students.
- ✓ 3. Continue to communicate internally to increase awareness and engagement with our work and publish an annual Campus News update on progress against the Blueprint.
- ✓ 4. Update safeguarding procedures and training to strengthen guidance in regard to potential student exploitation and modern slavery.

## Our actions

- ✓ 1. In support of the goal to ensure education and training on modern slavery is part of professional/practitioner degree programmes at the University of Nottingham, staff members delivered modern slavery content to Business School students within a course on Business, Human Rights and Sustainable Development; and to Health Sciences students within the School's three degree programmes (Nursing, Midwifery, Physiotherapy and Sport Rehabilitation). The School of Sociology and Social Policy's Social Work Programme delivered its Continuing Professional Development open programme for social workers (for all levels and experience, including family support and preventative services), a series of full day courses including content on the sub-areas within modern slavery of forced marriage and child sexual exploitation.

A modern slavery pod-briefing has been available for all University of Nottingham staff and has been hosted and tracked by the University's Legal team for a number of years. The pod-briefing video is currently hosted on the University of Nottingham's MediaSpace video streaming platform. To ensure that access remains tracked, staff can 'book' onto it via the Central Short Courses website.

As a part of the Learning & Development Compliance Training project, modern slavery is now included in compliance training for all staff at the university.

This year, the university's Legal team reviewed the original pod-briefing and found elements that are no longer current. As a part of the Compliance Training project, the pod-briefing is therefore being re-developed to both update the content and to ensure that tracking of compliance is meaningful. We are turning the resource into an e-learning training resource with a set of activities/scenarios that are tied to the core learning outcomes of the resource. Completion of the resource is dependent on these activities being completed successfully (in the same way that other university statutory learning is presented).

- ✓ 2. The University's Learning & Development (L&D) team are also actively engaging with the Rights Lab to utilise up-to-date video resources that will be incorporated into the new modern slavery compliance training resource currently due to launch by the start of FY24/25.
- ✓ 3. The Working Group will publish a Campus News update about its progress to coincide with the publication of this statement.
- ✓ 4. The Working Group is working with the safeguarding team to strengthen guidance regarding student exploitation and modern slavery within the upcoming updated training resources.

# Civic engagement

Through the work of the university's Rights Lab and the Modern Slavery Act Working Group, we continue to drive our civic agenda and support partners and other organisations to build capability and approaches to understand and mitigate risk of modern slavery. This year we achieved the following:



## Our commitments

- ✓ 1. Continue to host student placements on the topic of modern slavery (in order to educate and engage across the student population beyond normal teaching activities).
- ✓ 2. University staff will continue to deliver talks and presentations locally and nationally, including on-going dissemination of the Slavery-Free Campus Blueprint as part of a wider engagement effort around the mission of universities in delivering progress on anti-slavery goals.
- ✓ 3. Further develop the Alliance Against Exploitation (with partners including SCAPE and the GLAA) tackling exploitation risk in construction.
- ✓ 4. Respond to BS 25700, the world's first national standard on modern slavery (developed by the BSI with the Rights Lab at the university).
- ✓ 5. Develop the first ISO (International Organisation for Standardization) standard on modern slavery (building on the university's previous work developing BS 25700).
- ✓ 6. Continue our involvement with and support for the Nottingham and Nottinghamshire Modern Slavery Partnership.
- ✓ 7. The Rights Lab will partner with Nottingham Trent University on new local research into the lived experience of workplace coercion, exploitation and modern slavery in the community across Nottingham.
- ✓ 8. Complete an analysis of Nottingham City Council procurement for modern slavery risk (with the goal of further developing the Council's own slavery-free blueprint and risk assessment now that the Modern Slavery Act of 2015 applies to public sector bodies). Explore opportunities to support other Councils across the country.
- ✓ 9. Work with the GLAA and Police Regional Modern Slavery and Organised Immigration Crime Coordinator to understand and, where possible monitor, local modern slavery risks for our students (particularly international students) and to inform our awareness campaigns and due diligence approaches at the university.

Our actions

- ✓ 1. The university's Rights Lab hosted 15+ students during 2023-24 for placements that focused on a range of modern slavery topics, including work on supply chains, business standards and legislation. These placements developed new skills, knowledge and interests.
- ✓ 2. Through the work of the university's Rights Lab and the Modern Slavery Act Working Group, we continue to drive our civic agenda and support partners and other organisations to build capability and approaches to understand and mitigate risk of modern slavery. This year we achieved the following:
- ✓ 3. University staff joined the Nottingham office of the law firm Browne Jacobson and the Gangmasters and Labour Abuse Authority (GLAA) and the University of Nottingham's Rights Lab (UoN) to deliver training and discussion on the key obligations of an organisation in relation to the Modern Slavery Act and procurement practices. The session was attended by senior leaders responsible for publishing their organisation's modern slavery statement, compliance, procurement and outsourcing, safeguarding and risk managers across multiple areas within the public and private sector.

The Modern Slavery Act Working Group held advisory meetings or exchanges about implementing the Slavery Free Campus Blueprint, a pioneering 38-step process developed and launched by the University of Nottingham in 2021. For example, we exchanged best practice with the London School of Economics, the University of Tasmania, and the University of Sydney. At the University of Sydney, the university's Modern Slavery Unit, housed within the Office of the Provost and Deputy Vice Chancellor, completed a comprehensive mapping of university practice against the University of Nottingham's Slavery Free Campus Blueprint plus new planned actions against each step.

The charity Survivors of Human Trafficking in Scotland (SOHTIS) has also used the Blueprint, by taking its learning and making it relevant to their Student Ambassador Programme which works with higher and further education institutions to raise awareness and support sustainable, scalable and systemic change towards the eradication of human trafficking in Scotland.

Via the Rights Lab, the university continues to serve on SCAPE's Modern Slavery Partnership; a long-term collaborative working group to address how modern slavery is identified, dealt with, and ultimately prevented in the construction industry. SCAPE is a leading public sector procurement specialist wholly-owned by six local authority shareholders: Derby City Council, Derbyshire County Council, Gateshead Council, Nottingham City Council, Nottinghamshire County Council and Warwickshire County Council. The Modern Slavery Partnership also includes Achilles, Unseen, the GLAA (Gangmasters & Labour Abuse Authority), the Supply Chain Sustainability School and Mercaston Solutions Ltd. The group aggregated and analysed data and responses from site surveys and management system audits, and over 4,000 construction workers during 2022/23, then created a set of recommendations for every project commissioned and delivered via SCAPE frameworks to ensure fair and ethical treatment. Then over the 2023/24 period, the partnership, SCAPE and its delivery partners (construction companies) committed to reinforcing the need for modern slavery awareness and training, conducting consistent Right to Work checks and providing clear communication to the workforce around employment terms and expectations.

- ✓ 4. BS 25700, the world's first national standard on modern slavery (developed by the BSI with the Rights Lab at the university), is now aligned with the Rights Lab's Risk Management Framework. This informs guidance for action in response to risk assessments of an organisation's operations and supply chains. This comprehensive risk assessment has been applied to both the University of Nottingham and Nottingham Venues).
- ✓ 5. Business School Professor, Alex Trautrimis, is now chairing the development of ISO/NP 37200 (Guidance for the prevention, identification and response to human trafficking, forced labour, and modern slavery). This follows his previous work developing BS 25700 (Organisational responses to modern slavery). This document will provide organisations with guidance for managing the risk of human trafficking, forced labour and modern slavery including prevention, identification, response, remediation, mitigation, and reporting in its operations, supply chains and its wider operating environment.
- ✓ 6. The university, via the Rights Lab, continued to work as part of the Nottingham and Nottinghamshire Modern Slavery Partnership, whose work includes the delivery of annual awareness sessions and information and updates to front line staff and third sector organisations. The Rights Lab also hosted the UK's new Independent Anti-Slavery Commissioner, Eleanor Lyons, for a visit to the campus that involved a session with the Partnership and the Nottingham City Council Slavery Exploitation Team.
- ✓ 7. The university and the Rights Lab have partnered with Nottingham Trent University and the GLAA on new local research about the lived experience of workplace coercion, exploitation and modern slavery in the community across Nottingham. This research is a funded PhD studentship with Co(l)laboratory is a pioneering eight year project supported by Research England, Nottingham Trent University, the University of Nottingham and the Universities for Nottingham partnership. The PhD research project centres on advancing community-led knowledge on the lived experience of labour market coercion, exploitation, and the potential for modern slavery, with an explicit emphasis on locally sourced and locally relevant research.
- ✓ 8. The Rights Lab completed a draft analysis of Nottingham City Council procurement for modern slavery risk. The analysis covers the Council's procurement portfolio and will be further developed with action recommendations in collaboration with the Council's procurement team.
- ✓ 9. Our reporting on actions against the commitment to further understand exploitation risks for international students are now reported on in the new Students section of this report.





# Research and innovation & fundraising



The university already operates within the UKRI trusted research framework with respect to validating and ensuring our international research collaborators adhere to the highest standards of ethics and governance. The university will continue to clearly contract for adherence to its Modern Slavery Statement with our international research partners.

The university also has a very clear policy on accepting gifts and donations within the existing Ethical Fundraising Policy. At the moment, the only reference to modern slavery is within Section 3.4 which states: “As part of our due diligence checks, we require any organisations with an annual turnover of more than £36 million to have filed a Modern Slavery Statement, in accordance with the Modern Slavery Act 2015.”

The Trusted Research team are responsible for ensuring regulatory compliance such as export controls and modern slavery. Contracts ensure legal compliance. Our processes are modelled on the NPSA Trusted Research Guidance and UKRI’s Trusted Research and Innovation Principles. The work for January 2025 would be to ensure continued adherence and ensuring best practice (as legislation and UKRI Terms and Conditions routinely change).

University of Nottingham template clauses already include wording to abide with the Modern Slavery Act (MSA).

# Students



A number of international students come to university without a clear understanding of how expensive life in the UK is. They urgently seek work and are at potential risk of exploitation.

The GLAA’s 2023-24 Strategic Assessment reported that the sharpest increase in reports of forced labour in the UK during 2022-23 was in the residential care sector, and that the current intelligence picture suggests workers in this sector are highly likely to be Indian nationals, both male and female, on student visas. Often these students work more than the 20 hours allowed by the visa.

The Modern Slavery Act Working Group also noted an interim report of a project from Middlesex University that surveyed ~250 students (almost half of whom were international) and found that students were unsure of their employment rights, a quarter complained of unpaid extra work, a third experienced discrimination at work and one in five reported accidents and injuries at work.

The Union Development Officer (2023-24) of the Students’ Union (SU) has enthusiastically and actively engaged with the Working Group through the year with a broad discussion under three key areas:

- ✓ 1. Beginning to identify the key risk issues for students at the University of Nottingham, understand the student voice / context / lived reality
- ✓ 2. How to raise student awareness on the topic of modern slavery
- ✓ 3. Exploring how teams across the university could work together to proactively mitigate the risk of student exploitation.

In addition to these activities led by the SU, the Working Group has engaged with university-wide student recruitment, visa compliance and wellbeing / safety teams through the year to discuss the issue of modern slavery. One aim was to check that these teams were working closely with each other, in particular the Safeguarding and Visa and Immigration Teams.

Relevant university teams have reviewed a series of slavery-linked compliance processes and safety nets this year. In particular, the university’s newly drafted institutional UKVI academic engagement Code of Practice now provides a key risk mitigation in terms of our ability to identify and manage cases of non-engagement and poor engagement and from this, identify where students may be at risk/vulnerable to modern slavery or exploitation.



The university has a strong immigration compliance position which is assessed annually by the Home Office via its Basic Compliance Assessment (BCA). This shows year on year, a very low visa refusal rate plus high enrolment rate indicating that students are genuine and credible. Our high completion rate indicates that students come and do what they intend to do and successfully complete their course of study. This is confirmed in our latest BCA report.

The university continues to run due diligence on current student cohorts. This year our activity confirmed that there were no observed incidences of modern slavery in care home work among our student population.

Further responding to the threat of rising exploitation in the care sector, the Rights Lab worked with three local authorities, including Nottinghamshire County Council, and the Local Government Association (LGA) to develop modern slavery risk assessment and due diligence guidelines for councils delivering adult social care. The launch webinar, hosted by the LGA, was attended by over 180 people and the LGA site hosting the guidelines has been viewed over 800 times.

Further work that is in progress in response to potential risks includes:

- ✓ 1. Safeguarding Procedures specifically reference modern slavery and that these have been reviewed.
- ✓ 2. Ongoing liaison with the Police Regional Modern Slavery & Organised Immigration Crime Coordinator to understand local risk, and a presentation has been provided to the UoN Safeguarding Leads Network in July 23 with a focus on risks to Chinese students.
- ✓ 3. Exploitation has been added as a specific category on the Report and Support system, to enable easier access to data/reporting on this issue.
- ✓ 4. Information about risk to students in regard to modern slavery has been included in the Safeguarding at UoN training which all student facing staff should complete every 3 years.

# Our commitments for financial year 2024-25

The Working Group will continue to progress its work in the coming year with a particular focus on the following areas:

## Governance

- 1. Expand our engagement with internal and external stakeholders to support our anti-slavery goals with a specific focus on key subsidiaries.
- 2. Review and refine university policies and procedures (including reporting mechanisms and visibility of key information).
- 3. Investigate how to incorporate modern slavery requirements into the development of the University’s new HR, Finance and Procurement system (Unicore) that is due to go live in the coming year and will support our anti-slavery work.
- 4. Incorporate the risk assessment results, and associated recommendations from the recent comprehensive assessment of the University’s modern slavery risks via the Rights Lab’s Modern Slavery Risk Barometer, into 2024/2025 improvement action planning.

## Managing risk in the supply chain

- 1. Assess any changes from running our annual assessment on procurement spend relating to the distribution of risk in our supply chain. Build relevant data from this assessment into category strategies and resulting approved suppliers.
- 2. Our Procurement team have committed to assess the modern slavery risk for every new procurement using our in house tool and track the risk profile of our activity via monthly KPIs alongside sustainability, EDI and social value as part of our commitment to conduct responsible procurement.
- 3. The Procurement team have engaged with Electronic Watch to assess the specific risk throughout their supply chain for laptops and desktops. This information will be used to help mitigate future risk when retendering this contract and address any actions that are recommended as part of the reports.
- 4. Ensure Tier 1 strategic suppliers are onboarded into our Supplier Relationship Management programme with an understanding of our work on a Slavery-Free Campus, introduce our Code of Conduct and explore activities our suppliers are undertaking in the detection and prevention of modern slavery in their supply chains that we may collaborate on. In addition, ensure the remaining supply chain agree to the Code of Conduct as and sign up to NetPositives so that resulting actions plans can be analysed and monitored.
- 5. Supplement our existing KPIs on modern slavery, sustainability, EDI and social value with richer data from our suppliers on risks and actions. This will allow the identification of focus areas where the university could provide further support to the supply base through education.

## Awareness and training

- 1. Work with relevant colleagues across the university to evolve our staff training offer on modern slavery into a new e-learning module that is required for all staff. Monitor and report on engagement.
- 2. Communicate internally to increase awareness and engagement with our work and publish an annual Campus News update on progress against the Blueprint.
- 3. Identify scope for supporting degree programmes to enhance student education and training on modern slavery, with a particular focus on professional degree programmes.
- 4. Host student placements on the topic of modern slavery (in order to educate and engage across the student population beyond normal teaching activities).
- 5. Work in partnership with relevant units across the university to ensure safeguarding procedures and training cover potential student exploitation.

## Civic engagement

- 1. Deliver talks and presentations locally and nationally, including on-going dissemination of the Slavery-Free Campus Blueprint as part of a wider engagement effort around the mission of universities in delivering progress on anti-slavery goals.
- 2. Participate in developing the first ISO (International Organisation for Standardisation) standard on modern slavery (building on the university’s previous work developing BS 25700).
- 3. Continue our involvement with and support for the Nottingham and Nottinghamshire Modern Slavery Partnership.
- 4. Continue to partner with Nottingham Trent University on local research into the lived experience of workplace coercion, exploitation and modern slavery in the community across Nottingham.
- 5. Identify opportunities to engage with the newly elected Nottinghamshire Police and Crime Commissioner on the topic of modern slavery locally.
- 6. Promote the adoption of modern slavery risk assessment and due diligence guidelines for the delivery of adult social care services among local authorities across England and Wales.





## Research and innovation & fundraising

- 1. Continue to work in the UKRI trusted research framework with respect to validating and ensuring our international research collaborators adhere to the highest standards of ethics and governance and continue to clearly contract for adherence to UoN’s modern slavery statement with our international research partners.
- 2. Research development team to review modern slavery contract clauses in January 2025 to ensure all aspects of development of modern slavery activities are aligned to UoN and UK Government policy and reflect the principles of collaborative, equitable and just international partnerships that are free of exploitation of any nature.
- 3. Review the current ethical fundraising policy on accepting gifts and donations in the context of modern slavery and update if required.
- 4. By January 2025, our Research Contracts Team will have conducted a comprehensive review of the modern slavery contract clauses and trusted research guidelines. This review aims to ensure that all aspects of modern slavery activities align with UoN and UK Government policies and embody the principles of collaborative, equitable and just international partnerships, free from any form of exploitation.
- 5. To further ensure compliance and understanding of modern slavery obligations among our researchers and partners, we will include further specific reference to modern slavery requirement in our contracts training programs. This will focus on the aspects of the legal requirements within the research context.

## Students

- 1. Create an actionable plan under the key areas outlined by an internal working paper produced by the SU that will form the basis of activities through FY24/25.
- 2. Continue to engage with the SU on modern slavery issues and risks under the three broad themes noted above: of identifying risks; raising awareness; and cross-team, proactive risk mitigation. Refine specific action plans and deliver initial actions.
- 3. Have a visible presence on the topic of modern slavery, trafficking and exploitation at the “Know Your Rights Fair” in October, part of the SU Freshers program.
- 4. Develop a suitable student-focused webpage with a QR code that can be distributed / highlighted at relevant student-facing events.
- 5. Host and disseminate any informational resources visible in the SU advice centre.
- 6. Monitor Report and Support for any potential modern slavery concerns about students.
- 7. Work with UoN Police Officers to ensure links with the Regional Lead are maintained and updates provided to our Safeguarding Leads.
- 8. Explore how our student engagement dashboard could flag concerns around student attendance on courses that may suggest a risk of modern slavery, linking closely with the Safeguarding (Report and Support) team.

## Conclusions

The University of Nottingham, UK remains committed to combatting modern slavery and human trafficking. This statement has detailed how the University’s structures, processes, recent actions directly address the Government’s key modern slavery themes as well as key commitments for the coming year. Measurable progress continues to be made on all key elements with the latest end-of-year analysis demonstrating a maturity score of 85% against the blueprint originally published in 2021.

### University Executive Board and Council approval

This Statement was approved by the University of Nottingham Council on Friday 20 September 2024.



**President and Vice-Chancellor, Professor Shearer West CBE**

Date: Friday 20 September 2024

# Appendix 1 – Workstream mission statements and stakeholders

## Workstream 1 – Governance and policy

The University of Nottingham is committed to combatting modern slavery and human trafficking. Whilst the majority of the research and impact work related to this subject is delivered by the university’s Rights Lab, the Modern Slavery Act Working Group is the mechanism that has been set up to ensure that key functions and elements of the university are joined up where required, to address relevant issues, and that the legal requirement to produce an annual statement, pursuant to Section 54 of the Modern Slavery Act 2015, is met. Workstream 1 (Governance and policy) is responsible for ensuring the structure and operation of the Working Group and also ensures that reviews / updates / refinements of relevant university policy occur.

Key internal stakeholders: UEB; Legal; HR; Rights Lab

Current Workstream Lead: Dean of Nottingham University Business School (Professor David Park), Chair

## Workstream 2 – Training and awareness

This workstream looks to ensure that awareness is suitably raised about the issue of modern slavery and that the training offer is fit for the purpose of achieving this.

Responding to the Modern Slavery Act is one of the statutory duties the university needs to honour. It is therefore important that the training element is suitably engaging. The previous training materials have been reviewed by Legal Services to ensure they reflect the latest understanding of the Act ahead of a redesign to a more engaging e-learning offer for launch in 2024. Any subsequent university policy changes in this area will be reflected in a subsequent review of the training during 2024/25.

Key internal stakeholders: HR; Rights Lab

Current Workstream Lead: Associate Director of Learning and Development (Mark Wright)

## Workstream 3 – Research and innovation & fundraising

We aim to ensure that our researchers and staff are both aware and mindful of the Modern Slavery Act and any potential implications or interactions our research and commercialisation work may have, across the university, with the institutions we work with, both nationally and with the international collaborations in which we engage.

Key internal stakeholders: Rights Lab; Global Engagement and Strategy Support Unit (GESSU); Research and Knowledge Exchange development Network (PM-RDN); R&I Contracts and Research Operations teams

Current Workstream Lead: Strategic Lead, International, Research and Innovation (Dr Maeve Fitzpatrick)

## Workstream 4 – Managing risk in the supply chain

We aim to mitigate the risk of slavery in the supply chain by promoting awareness in the supply chain, by ensuring supplier approval processes are proportionate to the level of risk, by conducting robust checks and monitoring them regularly and by implementing our standards through the University code of conduct, tender assessment and appropriate contractual conditions. Our overriding goal is to improve the visibility of where risks are in the supply chain and work with our suppliers to tackle this problem collaboratively.

Key internal stakeholders: Procurement; Rights Lab; Legal; Governance

Current Workstream Lead: Head of Procurement (Rosalie Parkin)

## Workstream 5 – Students

We aim to reduce risks to students around modern slavery and exploitation by promoting awareness through staff safeguarding training and student focused campaigns. We will continue to build on robust monitoring processes to focus on potential risks to international students identified within the sector and to and our wider student community through our central safeguarding reporting system. Our goal is to reduce potential risk to students and to enable swift safeguarding responses to any identified risks.

Key internal stakeholders: Student Union; Visa and Immigration Team; Wellbeing Team

Current Workstream Lead: Senior Manager for Safeguarding (Laura Sanderson)

## Workstream 6 – Civic engagement

We aim to collaborate locally, including in the city of Nottingham, county of Nottinghamshire and across the East Midlands area, to exchange knowledge about tackling modern slavery risks, share best practices for creating slavery-free environments (cities, communities, campuses), and collaborate on local anti-slavery multi-sector partnership and project work. This aim is rooted in the University’s civic ambition to improve the levels of prosperity, opportunity, sustainability, health and wellbeing for local citizens, families and communities, and supports the University’s Civic Strategic Delivery Plan.

Key internal stakeholders: The Rights Lab; University of Nottingham Civic and Regional Committee; Universities for Nottingham; University of Nottingham Political and Civic Affairs Team; Nottingham University Business School Associate Dean for External Engagement; University of Nottingham Institute for Policy and Engagement

Current Workstream Lead: Director of the Rights Lab (Professor Zoe Trodd)





# Appendix 2 – 38 steps to a Slavery-Free Campus

Take action for a Slavery-Free Campus – a Blueprint: 38 practical steps for universities to tackle modern slavery

Governance and management on campus	
Leadership	
G1	Assign accountability for addressing modern slavery and human trafficking to a Council or Board level.
G2	Form a Working Group to tackle modern slavery that includes staff from different and appropriate functions (for example, Procurement, HR, Estates). Assign operational responsibility/group leadership to an individual with the right skills, interests and influence.
G3	Working Group to discuss and initiate wider consultation on what the university wants to achieve in the area of preventing and ending modern slavery, for example, do we want to be a leader in our peer group, be a Slavery-Free Campus or meet basic legal and industry standards? Get agreement and commitment to university goals from Council/Board.
G4	Working Group to develop a map of the university’s key internal and external stakeholders, including owned/partially owned subsidiaries and key partners, to understand who the university impacts through its operations and supply chain and who can support it in its antislavery goals. It is likely that all professional service departments will need to take responsibility for steps in the university’s antislavery Blueprint (Estates/ Facilities; Finance; Procurement; Human Resources; Governance; Research).
G5	Working Group to develop an implementation plan for how to achieve the university’s goals, setting clear objectives over time with clear ownership and required resources.
G6	Working Group to develop a Modern Slavery Dashboard containing key indicators of performance for own operations and supply chain towards the university goals to manage progress. Also to consider how to track and evaluate the effectiveness of actions taken in response to human rights risks.
G7	Working Group to lead on regular short-term reviews of progress towards its goals and to inform the annual, legally-required review and update of each university’s Modern Slavery Statement. This should include progress against key performance indicators and the year-on-year improvement plan across processes and systems plus future commitments. Internal audit involved to bring rigour and challenge to the programme, key risks should be added to the university Risk Register.
Policies	
G8	University Governance to develop a university Ethical Framework defining the ethical standards that the University sets across all of its activities. This covers stakeholder engagement, research, business operations, donations and governance. The Modern Slavery and Human Trafficking Policy within this blueprint should reflect the ambition of the university as determined in G3.

G9	University Finance to review approach to investment to ensure their ethical investment or responsible investment policies include modern slavery. Consider being signatories of the United Nations Principles of Responsible Investment.
G10	University research services and fundraising departments to ensure that policies on research partnerships (including industry partnerships) and donors include work to ensure the university is not sending or receiving funds to and from external organisations that do not have risk mitigation in place.
G11	University HR to ensure recruitment policies set out the requirement to be aware of modern slavery in recruiting staff, and that the university mitigates slavery risk through checks on right to work in the UK. This includes via third parties as well as direct recruitment.
G12	University Procurement policy to reflect focus and ambition on reducing modern slavery risk in the supply chain as part of corporate social responsibility (CSR) approach.
Procedures and management	
G13	University HR and Student Services to actively support the safe migration of staff and students respectively via appropriate advice and monitoring of visas.
G14	Working Group to support the university to map and review existing university procedures and ensure that modern slavery is referenced and staff, students, suppliers and partners understand what steps they are responsible for. This should include staff guidance, disciplinary procedures, induction and training, supplier social audit procedures and access to remedy arrangements.
G15	University HR to establish processes for recruiting staff which include recording: how the worker found out about the work, whether the worker has paid anyone or will have to pay anyone to obtain the work, whether the worker has paid anyone to get into the country, the worker’s landlord’s name and the worker’s address.
G16	University HR to demonstrate that regular audits are conducted to check that good practice in identifying, deterring and tackling hidden labour exploitation is being consistently applied throughout the business. Establish regular checks of employees’ and applicants’ addresses for high occupancy of particular houses and act accordingly on the information. Check bank accounts to identify unrelated employees paid into one account; mobile phone numbers to identify seemingly unrelated employees who are contactable through one or sequential numbers; documents for the same next of kin and/or same place of origin/location in home country; emergency contact numbers to identify seemingly unrelated employees who are contactable through the same number. Act accordingly on the information for all these checks.
G17	University HR to demonstrate that complaints/grievance procedures are in place, issued to all staff and operated fairly and independently.
G18	University Registrar’s Office to demonstrate that a whistleblowing procedure is in place whereby all staff can confidentially raise issues of concern to a member of the senior team without fear of retribution and there is a process for responding to complaints or reported violations.
G19	Working Group to develop channels for gathering and analysing future risk information from sources such as whistle-blower hotlines, community-facing grievance mechanisms and stakeholder engagement, including suppliers. Establish a process to disclose any issues and build improvement actions based on this data and risk assessment.

### Awareness and training for staff and students

<b>T20</b>	Working Group to engage internally, communicating the university's goals for tackling modern slavery and updates on progress.
<b>T21</b>	Working Group to have a process to make all new staff aware of modern slavery through an organised induction programme and to communicate changes in policies and procedures to staff, students, suppliers and partners.
<b>T22</b>	Campus leaders on education (for example, PVC/APVCs) and Student Union to consider how to integrate the topic of modern slavery into student education and work with faculties/schools to include modern slavery in the syllabi of all front-line degree programmes.
<b>T23</b>	Working Group to outline all relevant parties to inform an on-going awareness and training plan that should include at minimum procurement, senior management, human resources, and compliance officers. Training plan to include how to implement modern slavery policies, identify modern slavery in practice and report on incidents/concerns.
<b>T24</b>	University Procurement to provide regular, specific training for their staff and conduct regular reviews of their procurement practices.
<b>T25</b>	University HR to facilitate training of counselling staff, student tutors, Residential Experience team, campus security staff, 'nightline' volunteers and any other students or staff members who hold pastoral roles within the university to spot the signs that may indicate exploitation and ensure victims who come forward are given appropriate care. This training should be repeated annually.
<b>T26</b>	University HR to ensure staff responsible for recruitment to the university's own operations and labour providers staff are trained on modern slavery policies and risk mitigation strategies. To include instructions to report and record where work-seekers are introduced by an individual claiming be a relative or friend but may be exerting control over the workers (for example, speaking for them or waiting while they are interviewed).
<b>T27</b>	Working Group to support Student Union (SU) council on developing and approving new policies that examine the SU's own supply chains, ethical guidelines for suppliers, staff training and awareness-raising.

### Managing risk in the supply chain

<b>S28</b>	University Procurement to establish an annual risk assessment to analyse where the greatest likelihood of slavery is within the organisation's operations and its supply chain, including subcontractors. Use this, along with spend analysis (indicates where we may have most influence) to prioritise where action is focused and apply due diligence to high-risk suppliers. Disclose priority areas for action.
<b>S29</b>	University Procurement to develop a Supplier Code of Conduct that sets out Slavery and Labour standards to be upheld by direct suppliers and in the supply chain in line with our standards. Use a Supplier Relationship Management Programme to complete an annual check that ensures all managed suppliers' MSA statements are up to date along with reporting of any known breaches either directly or within their supply chain.

<b>S30</b>	University Procurement to ensure the procurement process includes modern slavery in category strategies, with the particular risks of the category identified; tendering process, with specific requirements placed on the supplier when a high risk of modern slavery is present; contracts, with KPIs reflecting specific risks; supplier meetings and contract management.
<b>S31</b>	University Procurement to review and amend procurement practices to ensure they do not exacerbate the risk of modern slavery, develop transparent and open relationships with suppliers and partners and customers, establishing clear, timely communication with suppliers and partners, paying a sustainable price, setting clear lead-times and payment terms and giving preference to suppliers and partners who respect human rights.
<b>S32</b>	University Procurement to ensure that all contracts for recruitment services contain the necessary complaints/grievance procedure, issued to all workers and operated fairly and independently. HR to ensure contractual obligations around MSA are monitored for all recruitment services. Establish systems for monitoring labour providers and labour sourcing agents to ensure no fees are charged to workers, directly or indirectly through the required purchase of goods or services. Discuss and agree the recruitment selection criteria and a fair and non-discriminatory process used by labour providers. Ensure the minimum wage is paid to all staff.
<b>S33</b>	University Procurement and Supplier Relationship Managers to target high-risk areas on which to focus for additional supply chain analysis, for example product areas such as lab consumables or electronics or services such as catering or construction. Explore use of supplier social audits to evaluate risk and support suppliers to mitigate risk over time.

### Civic and wider engagement

<b>C34</b>	Working Group to build networks and engage with organisations operating in the antislavery and labour exploitation arena and with areas such as Supply Chain risk (for example, Electronics Watch) to establish how external tools can be utilised within the university and its supply chain.
<b>C35</b>	Working Group to work alongside university research centres and students to ensure the organisation is participating in and supporting the work of local antislavery multisector partnerships and local prevention programmes. This could include event hosting, support for training materials or website development, and support for front-line professionals in training, and monitoring and evaluation services.
<b>C36</b>	Working Group to help the university develop a partnership approach to modern slavery in the local area with other local universities, to share best practice and work towards to goal of creating Slavery-Free Cities.
<b>C37</b>	Working Group to support a university commitment to involving modern slavery survivor input and leadership in Slavery-Free Campus efforts, recognizing the value of the expertise of those with lived experience.
<b>C38</b>	University campus life office to support and encourage student antislavery activities, including by student groups and unions, and where possible, invest in student-led programmes, an example being the campus-wide reading programme University of Nottingham (UoN) Against Slavery (2018-19).





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